
CONTINUATION OF COMPLAINT

Introduction

I, Henrik Impola, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been since February 16, 2010. I am currently assigned to the Detroit Division at the Flint Resident Agency. As a Special Agent of the FBI, I am authorized to investigate crimes involving the sexual exploitation of children. In my career in law enforcement, I have investigated multiple cases, including several dealing with the sexual exploitation of children.

2. The facts in this continuation come from my personal knowledge obtained during participation in this investigation, information from other individuals including other law enforcement officers, my review of documents and computer records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this continuation is submitted for the limited purpose of establishing probable cause in support of a criminal complaint, it does not set forth each and every fact that I or others have learned during the course of this investigation.

3. This continuation is submitted for the purpose of obtaining an arrest warrant for SAMEER GADOLA for the offenses related to sexual exploitation of children, including production and attempted production of child pornography, in violation of Title 18, United States Code, Section 2251(a) and (e); and receipt and attempted receipt of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1).

Probable Cause

4. On May 23, 2016, the FBI initiated an investigation to support the Shiawassee County Sheriff's Office (SCSO). SCSO had information that a 13-year-old boy (hereafter referred to as Victim 1) was engaged in Instagram communication with GADOLA, who appeared to be trying to meet with Victim 1 for the purposes of sex.

5. SCSO originally received information on May 6, 2016 from Victim 1's mother, whose name is known to me, but whose identity is withheld, hereafter referred to as Witness 1. Witness 1 stated that she logged into her son's Instagram account and learned that he has been communicating with "**meerkatgadola_spartan4life**" for the past two weeks. The user of **meerkatgadola_spartan4life** appeared to be "grooming" her son and talked about meeting in person, causing Witness 1 to be concerned for her son's safety.

6. Witness 1 provided a printout of Instagram messages to her son from **meerkatgadola_spartan4life** (later identified as GADOLA). A review of

Instagram messages between GADOLA and Victim 1 determined that GADOLA appeared to know the victim's age and attempted to entice the victim for the purposes of sex. GADOLA made statements about taking the victim out to eat, rubbing ice cream on his face, asked if he ever gets messy hands, and made the statement "I'd take those cute Hands and wipe them on your face", followed by, "I'd wipe your face cuz it'll get sticky lol." When a message was sent from Victim 1's account asking if GADOLA was horny, GADOLA responded by asking if the victim's "dick was hard."

7. GADOLA stated that he has been a mentor for a "ton of kids" and that he would not molest "any young boy" because his best friend was previously molested. GADOLA frequently referred to Victim 1 as "my boy", such as in the statement "Does my boy get messy a lot?" Witness 1 stated that her son has told GADOLA that he participates in sports for a local school district, and that GADOLA planned to come to watch Victim 1's sporting event on May 10, 2016. The FBI helped SCSO perform analyses of social media accounts, including an Instagram account, a Facebook account, and a Twitter account belonging to GADOLA. The Instagram account was **meerkatgadola_spartan4life** and the Facebook profile was **sameer.gadola**. State search warrants were executed on those accounts, and then the FBI executed search warrants on GADOLA's Verizon cell phone number, 517-899-4171, and Snapchat account, "**meerkat_msu**." (Federal Search Warrants 1:16-MJ-253 and 1:16-MJ-254 authorized by U.S. Magistrate Judge Ray Kent, on

September 22, 2016, and incorporated herein.)

8. A review of the search warrant results allowed the FBI to positively identify GADOLA. The Instagram account profile "**meerkatgadola_spartan4life**" included a link to the Facebook profile "**Sameer Meer Kat Gadola**", Facebook profile ID "**sameer.gadola**." A Michigan Driver's license photograph of SAMEER GADOLA was consistent with pictures posted on the Instagram and Facebook profiles.

9. A detailed review of GADOLA's Instagram, Facebook, and Snapchat search warrant results determined that he engaged in many online relationships with boys and girls who appeared to be under the age of 18 for the purpose of sex. The online relationships viewed on Instagram, Facebook, and Snapchat included fragmented conversations in which the discussion of sex or the discussion of nude photographs occurred. These fragments were frequently without context and frequently referenced conversations that occurred via text message, in person, or on other unknown social media applications. However, by analyzing many conversations, the FBI was able to identify common tactics used by GADOLA to entice children to send or receive nude images or to meet him in person.

10. GADOLA frequently discussed engaging in an "older brother" mentorship of children, including making arrangements to attend college football games with children, weight lift with them and train them, purchase sports shoes for them, take them out to eat at local restaurants, or take them to the pool or to a water

park. On June 18, 2014, there was a post on GADOLA's Facebook account that he was "Excited to work with Coach [*name redacted*] and [*school name redacted*] Football program this summer and fall!"¹ The statement "I wanna be a mentor for a boy at the #BoysAndGirlsClub" was posted on GADOLA's Twitter account on January 3, 2015.

11. The FBI determined that GADOLA frequently appeared to be making sexual advances on children who did not completely understand his intentions. These children, during the course of their conversations with GADOLA, provided their ages.

- a. On January 22, 2016, GADOLA sent a message on Instagram with the statements "Yep! I'd put my arms around us boys and say go state! And U can sit on my lap if you'd like too bud"; followed by "Okay buddy. You boys can sit on my lap anytime us boys want when we hangout. And I'll have fun bud."; followed by "I know u boys would love sitting on my lap while having fun watching sports bud"; to which a boy replied "I DON'T WANT TO SIT ON YOUR LAP IM 13."
- b. On February 10, 2016, GADOLA sent a message on Instagram with the statement "Aye. That's my boy! Lol. I've been on the field too a few times. I can maybe hook u up with some girls' numbers at frat and

¹ The name of the coach and the school are known to me, but are not included to protect the identity of the coach. There is no information that the coach engaged in any illegal activity.

sorority parties too kid”, to which a boy replied “I am only in 8th grade.”

12. The FBI was informed that Gadola had left the United States and would re-enter the country on January 6, 2015. The FBI asked for Customs and Border Protection assistance in securing GADOLA’s iPhone for search pursuant to a federal search warrant. (Federal Search Warrant in the Eastern District of Michigan, 2:17-MC-500017, authorized by U.S. Magistrate Judge Mona K. Majzoub on January 5, 2017, and incorporated herein.) During the inspection by customs officers, GADOLA stated that he “did not want to go to jail or turn into a monster like Jerry Sandusky.” He said he has a sickness and is trying to do the right thing and get better.

13. A preliminary review of the iPhone determined that GADOLA had a hidden application on the phone in which photographs could be stored. When GADOLA was questioned about the hidden photo vault, he provided a passcode for it, stated he forgot about it, and reported he hadn’t used it since October of 2016. GADOLA stated the photo vault had photographs on it which probably should have been deleted, and asked officers if they could delete the photographs for him.

14. After he was processed by customs officers, I interviewed GADOLA. He was advised he was not under arrest and was free to leave; he was also advised of his *Miranda* rights. He agreed to speak with me. During the course of the interview, GADOLA admitted to having sexual conversations with

multiple juveniles over Snapchat, Instagram, Facebook, and text message.

15. On GADOLA's Instagram account, he sent and received messages with another account, whose Instagram profile describes the user as a "Senior at [*name redacted*] High School" located in Florida.² A database check identified a boy (Victim 2) with the same name who lived in Florida, who was 16 years old at the time of the messages, and is now 17 years old. My review of the communication history suggests that GADOLA and Victim 2 had sexual discussions when Victim 2 would have been 16 years old. Pertinent messages from GADOLA to Victim 2 are as follows:

03/18/2016, GADOLA: "Hey bud, I love when u sit in my lap cuz I love u cutie"
[emoji]

03/22/2016, GADOLA: [A close-up picture of male genitalia was sent.]

03/22/2016, GADOLA: "Don't show anyone. This is between u an me bud"

03/26/2016, GADOLA: "What would you do bud?"

04/22/2016, GADOLA: [A close-up picture of male genitalia was sent.]

04/22/2016, GADOLA: "What else would us wanna do bud?"

05/16/2016, GADOLA: "Do you wanna put your dick in a girl's pussy bud?"

16. During my interview with him, GADOLA admitted that Victim 2 had trouble getting girls, looked up to him, and did not often masturbate. GADOLA

² The name of the school is known to me, but I am not including it to protect the identity of the child.

admitted that Victim 2 sent him a picture of his penis. Then GADOLA began helping Victim 2 to masturbate. Later, GADOLA and Victim 2 engaged in sexual acts in Florida.

17. During the FBI review of GADOLA's Instagram account, I noted that GADOLA sent and received messages with an Instagram profile ID of a victim whose identity was not known, but who appeared to be an underage girl, hereafter referred to as Victim 4, and who appeared to think that GADOLA was under-aged before having an extended conversation about sexual activity.

01/09/2016, GADOLA: "You're welcome! Love the sexy pose [emoji]"

01/09/2016, GADOLA: "Yw girl! U got snapchat?"

01/09/2016, GADOLA: "U got any other pics?"

01/09/2016, GADOLA: "U want me to send u a pic?"

01/21/2016, Victim 4: "r u actually 15" [emoji]"

01/21/2016, GADOLA: "Yes. Almost 16"

01/21/2016, GADOLA: "Have u ever touched a guys' private cutie?"

01/21/2016, GADOLA: "Mine lol. U wanna see a pic?"

01/21/2016, GADOLA: "What else would u want me to do to u? U could give me a handjob and a blowjob"

01/21/2016, GADOLA: "I think you'd be really hot when playing with yourself lol. With just me watching of course"

01/21/2016, GADOLA: "What do you do when u play with yourself? Rub your

cute pussy?”

18. When questioned about Victim 4, GADOLA did not recall her name or any contact with her over the internet. When provided a chance to review the above Instagram messages, GADOLA stated he did not recall sending them. GADOLA stated he is active on Instagram and has thousands of followers, so it is possible he met Victim 4 on Instagram or through a dating application “Hot or Not.”

19. During the FBI review of GADOLA’s Instagram account, I noted that GADOLA sent and received messages with an Instagram profile associated with Victim 5, who sent nude images of himself after GADOLA requested them. Based on a review of Victim 5’s Facebook account, I identified Victim 5 as a 17-year-old boy from Texas. A review of Victim 5’s Instagram account determined that GADOLA has had online contact with him since March 2, 2015, when Victim 5 was 15-years-old. When questioned about Victim 5, GADOLA admitted to having an online relationship after Victim 5, who needed help because he was bullied in school. GADOLA initially reported that he knew Victim 5 was 15 years old when they began exchanging messages, but later in the interview, after I told GADOLA he needed to stop all contact with Victim 5, GADOLA claimed he thought Victim 5 was 18 when they exchanged pictures. Pertinent Instagram messages between Victim 5 and GADOLA are included below. At the time these messages were sent Victim 5 was 16 years old.

03/19/2016, GADOLA: “U get bullied?”

03/19/2016, GADOLA: "Anytime kid! If u lived in Michigan I'd give us so much buddy"

03/19/2016, GADOLA: "I'd take u out to eat a lot too bud. Does my fav Mexican boy like back rubs? I'd give u great ones bud"

03/24/2016, GADOLA: "If we were to workout I'd et u sit in my lap and I'd have u lift weights bud. I'd have you start out with the 15's"

03/24/2016, GADOLA: "How would u wanna sleep with me bud. What position would us wanna be in bud?"

03/24/2016, GADOLA: "Awe thanks bud! U can sit in my lap whenever u want bud. Oh, U wanna know a better way to masterbate bud? I know so many tricks u might not know. Id totally teach u"

03/24/2016, GADOLA: "How big ru bud? If u don't know send me a pic and I'll know by just lookin at it bud."

03/24/2016, Victim 5: "What tricks do u know about"

03/24/2016, GADOLA: "If u wanna go faster get some lube lotion then just use your wrist"

03/24/2016, Victim 5: "I'm not sure I'm ready for this. I'm like new at this."

03/24/2016, GADOLA: "I think you're ready bud. Well first send me a pic of your dick. It's not being weird or gay I'm gunna tell u how big ur for starters."

03/24/2016, Victim 5: "Well I could tell you this. My dick is like 5 something inches long."

03/24/2016, Victim 5: "I'm a little uncomfortable sending dicks"

03/24/2016, GADOLA: "You gotta get comfortable buddy. If a girl wants one in the future u gotta be comfortable bud. I'm here and giving you a lot of help"

03/24/2016, GADOLA: "You can send one to me. U can trust me"

03/24/2016, Victim 5: "Ok but its not hard like biology videos"

03/24/2016, GADOLA: "Try to get it hard. Rub it to make it hard bud. If u can't get it hard send a pic of ur not hard"

03/24/2016, Victim 5: "Omg I made it hard"

03/24/2016, Victim 5: [A closeup picture of male genitalia was sent.] The photograph is focused on erect penis emerging from the waistband of a pair of Adidas pants. The image is marked as Exhibit 1 and is available for judicial review.

03/24/2016, GADOLA: "Looks like 6-8 inches bud"

03/27/2016, GADOLA: "Lol bud. Would u want to experiment and give each other hbdjobs. Even though we both r straight I think it'd be a good experiment"

03/30/2016, GADOLA: "U didn't tell me you were gay bud."

03/30/2016, Victim 5: "I was a little scared"

03/30/2016, GADOLA: "Lol buddy, nothin to be afraid of. I wouldn't get upset. I have a gf and I'm mostly straight but I also like boys as well."

03/30/2016, GADOLA: "Haha! What would u wanna do if I showed u mine if we

ever met in person bud?

03/30/2016, GADOLA: "Lol u could touch my dick bud. It won't bite kid"

03/30/2016, GADOLA: "I'd put my dick in your cut mouth too bud"

03/30/2016, Victim 5: "Never gone that far but ok"

03/30/2016, GADOLA: "Would u like me to send a picture of mine to u?"

20. During the FBI review of GADOLA's Snapchat account, I noted that GADOLA sent and received messages with Snapchat account used by Victim 7. Victim 7 has been identified as a 17-year-old male from Michigan. GADOLA stated "My boy got a huge cock i bet" and "Atta Boy! Wanna compare dude? It's not homo but I wanna see if my boy's is bigger than mine lol", to which Victim 7 replied "Yes." Following the conversation, on September 24, 2016, Victim 7 sent GADOLA an image of male genitalia. Victim 7 would have been 16 years old at the time. The image is of an erect male penis being held by a fist against a floral wallpaper background and is framed from the top of the thighs to below the navel. It is marked as Exhibit 2 and is available for judicial review. During the course of the January 6, 2017 interview, GADOLA reported that he was friends with Victim 7, had sent nude images of himself to Victim 7, and may have received a nude image from Victim 7, although he could not sure about it.

Conclusion

21. Based on his online activity, use of social media, and his statements, it appears that GADOLA has a sexual interest in children and obtained and attempted

to obtain sexually explicit pictures of minors.

22. Based on the forgoing information, I submit there is probable cause to believe that SAMEER GADOLA has violated 18 U.S.C. § 2251(a) and (e); and 18 U.S.C. § 2252A(a)(2) and (b)(1).